

Exhibit 11

Louisiana Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Louisiana – Meta Proposal

Search Terms: Meta made its most recent counterproposal on December 6, 2024, to the Louisiana (i) Department of Health, (ii) Office of Planning and Budget, (iii) Department of Education, (iv) Governor’s Office, (v) Department of Children’s and Family Services, and (vi) Department of Economic Development. At a high level, Meta’s proposal involves using search combinations that require either “Social Media Terms,” “Harm Terms,” or “Other Case Issue Terms” to occur either (a) “within 50” of one of the following “Youth Terms” for high volume terms as determined by Louisiana’s hit counts or (b) within the same document as the following “Youth Terms” for lower volume terms:

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor*
OR young* OR child* OR underage* OR “under-age” OR juvenile*
OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13”
OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR “gen-
a*” OR scholar* OR School* OR student* OR pupil* OR grade*)

#	Social Media Terms
1	“Youth Terms” w/25 (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR “fb” OR “ig” OR “yt” OR “tt” OR “dm*” OR “direct message”)
	Harm Terms
2	“Youth Terms” w/50 (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	“Youth Terms” w/50 (“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4	“Youth Terms” w/50 (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)

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5	“Youth Terms” w/50 (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6	“Youth Terms” w/50 (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime OR staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	“Youth Terms” AND (eat* NEAR(3) (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	“Youth Terms” AND (sleep* NEAR(3) (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	“Youth Terms” AND (negative NEAR(3) (appearance OR experience OR affect* OR effect*))
10	“Youth Terms” AND (compar* NEAR(5) (appearance OR social OR other* OR negative))
11	“Youth Terms” AND (body NEAR(3) (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	“Youth Terms” AND (self NEAR(3) (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	“Youth Terms” w/50 (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14	“Youth Terms” w/50 (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
	Other Case Issue Terms
15	“Youth Terms” w/50 (polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide

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	OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
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Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012, to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Louisiana AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Dept. of Children & Family Services	David Matlock*	Secretary
Dept. of Children & Family Services	Aly Rau*	Deputy Secretary
Dept. of Children & Family Services	Rebecca Harris*	Undersecretary
Dept. of Children & Family Services	Rebecca Hook*	Director of Medical Services, Child Welfare Division
Dept. of Children & Family Services	Mona Chapman*	Deputy Assistant Secretary
Dept. of Children & Family Services	Kim Chachere*	Child Welfare Consultant
Dept. of Children & Family Services	Christy Tate*	Child Welfare Manager
Dept. of Children & Family Services	Connie Guillory*	Child Welfare Manager
Dept. of Children & Family Services	Leslie Calloway*	Deputy Assistant Secretary
Dept. of Children & Family Services	Sammy Guillory*	Assistant Secretary

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Agency	Custodian	Title
Dept. of Children & Family Services	Lorrie Briggs*	Deputy Assistant Secretary
Dept. of Children & Family Services	Monica Brown*	Deputy Assistant Secretary
Dept. of Children & Family Services	William Tilley*	Deputy Assistant Secretary, Child Support Enforcement
Dept. of Children & Family Services	Amy Whitehead*	Press Secretary, Communications Director
Dept. of Children & Family Services	Bret Hanemann *	Director of Governmental Affairs
Dept. of Children & Family Services	Ricky Montet *	Director of Emergency Preparedness
Dept. of Children & Family Services	Jessica Jones*	Chief Human Capital Officer
Office of Planning & Budget	Ternisa Hutchinson*	Prevention Consultant
Dept. of Education	Cade Brumley*	Superintendent of Education
Dept. of Education	John White*	Former Superintendent of Education (2012-2023)
Governor's Office	Jeff Landry*	Governor
Governor's Office	Angelique Freel*	Executive Counsel to the Governor
Dept. of Health	Emma Herrock*	Justice Involved Svcs. Coordinator
Dept. of Health	Bryan Hardy*	Medicaid Program Manager
Dept. of Health	Quinetta Womack*	Deputy Assistant Secretary, Office of Behavioral Health
Dept. of Health	Marisa Beard*	Director of Addiction Enhancements & Accountability

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Agency	Custodian	Title
Dept. of Health	Karen Stubbs*	Assistant Secretary, Office of Behavioral Health
Dept. of Health	Ashley Jefferson*	Senior Advisor, Office of Behavioral Health
Dept. of Health	Robyn Thomas*	Suicide Prevention Coordinator
Dept. of Health	Garcia Bodley*	Louisiana Spirit Program Director
Dept. of Health	Beth Morgan*	Program Manager
Dept. of Health	Avis Richard*	Director
Dept. of Health	Tiffany Treadway*	Unknown
Dept. of Health	Kelly Zimmerman*	Special Projects Director, Bureau of Health Services Financing (Medicaid)
Dept. of Health	Dawn Love*	Public Affairs, Bureau of Health Services Financing (Medicaid)
Dept. of Economic Development	Robin Porter*	Executive Counsel

Louisiana's Proposed Search Terms:

“Social Media” OR “SMP” AND “Youth”

“Social Media” OR “SMP” AND “Young Users”

“Social Media” OR “SMP” AND “Minors”

“Social Media” OR “SMP” AND “App Usage”

“Social Media” OR “SMP” AND “Mental Health”

“Social Media” OR “SMP” AND “Negative Effects”

“Social Media” OR “SMP” AND “Wellbeing”

“Social Media” OR “SMP” AND “Addiction”

“Social Media” OR “SMP” AND “Suicide”

“Social Media” OR “SMP” AND “Self-harm”

“Social Media” OR “SMP” AND “Compulsive Use”

“Social Media” OR “SMP” AND “Depression”

“Social Media” OR “SMP” AND “Anxiety”

“Social Media” OR “SMP” AND “Sleep Disturbances”

“Meta” OR “Facebook” OR “Instagram” AND “Youth”

“Meta” OR “Facebook” OR “Instagram” AND “Young Users”

“Meta” OR “Facebook” OR “Instagram” AND “Minors”

“Meta” OR “Facebook” OR “Instagram” AND “App Usage”

“Meta” OR “Facebook” OR “Instagram” AND “Mental Health”

“Meta” OR “Facebook” OR “Instagram” AND “Negative Effects”

“Meta” OR “Facebook” OR “Instagram” AND “Wellbeing”

“Meta” OR “Facebook” OR “Instagram” AND “Addiction”

“Meta” OR “Facebook” OR “Instagram” AND “Suicide”

“Meta” OR “Facebook” OR “Instagram” AND “Self-harm”

“Meta” OR “Facebook” OR “Instagram” AND “Compulsive Use”

“Meta” OR “Facebook” OR “Instagram” AND “Depression”

“Meta” OR “Facebook” OR “Instagram” AND “Anxiety”

“Meta” OR “Facebook” OR “Instagram” AND “Sleep Disturbances”

State Agencies Custodians:

Louisiana Department of Health:

- Bryan Hardy
- Quinetta Womack
- Marisa Beard
- Karen Stubbs
- Leslie Freeman
- Ashley Jefferson
- Robyn Thomas
- Garcia Bodley
- Beth Morgan
- Emma Herrock
- Avis Richard
- Tiffany Treadway
- Kelly Zimmerman
- Dawn Love

Louisiana Office of Planning and Budget:

- Ternisa Hutchinson

Louisiana Department of Education:

- Dr. Cade Brumley
- Dr. John White

Louisiana Governor’s Office

- Jeff Landry
- Angelique Freel

DCFS

- David Matlock
- Aly Rau
- Rebecca Harris
- Rebecca Hook
- Mona Chapman
- Kim Chachere
- Christy Tate
- Connie Guillory
- Leslie Calloway

- Sammy Guillory
- Lorrie Briggs
- Monica Brown
- William Tilley
- Amy Whitehead
- Bret Hanemann
- Ricky Montet
- Director Jessica Jones

LED

- Robin Porter